



1313 N. Market Street
Suite 5100
Wilmington, DE 19899-1709
302.777.6500
Fax 302.421.8390

Joanna J. Cline
direct dial: 302.777.6542
clinej@pepperlaw.com

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BY CM/ECF

The Honorable Debra Freeman
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Eastern Profit Corp. Ltd. v. Strategic Vision US LLC*,
C.A. No. 18-cv-2185 (JGK)

Dear Judge Freeman:

I write jointly on behalf of the parties to this action to respectfully request that Your Honor extend the deadline to file dispositive motions until January 31, 2020. The current deadline, per Your Honor's October 10, 2019 Order (Dkt. No. 172), is January 10, 2020. The parties request this modest extension to account for Judge Koeltl's recent order (Dkt. No. 209) scheduling a pre-motion conference on January 14, 2020 to address the parties' respective notices regarding their contemplated summary judgment motions.

To rectify this procedural conundrum—whereby the current deadline to file dispositive motions is to take place before Judge Koeltl holds his pre-motion conference—the parties jointly request that the Court extend the deadline to file dispositive motions until January 31, 2020. Doing so will allow the pre-motion conference to take place before the dispositive motion deadline.

We would be happy to discuss this issue further should Your Honor have any questions.

Respectfully submitted,

/s/ Joanna J. Cline

Joanna J. Cline

cc: All Counsel of Record (By CM/ECF)

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